

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America)

v.)

Floro PEREZ Andablo)

a.k.a. Floro Andablo, a.k.a. Floro Perez)

Case No. 2:24-mj-00030)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 24, 2024 in the county of Charleston in the
South Carolina District of South Carolina, the defendant(s) violated:

Code Section

Title 8, United States Code,
 Sections 1326(a) & (b)(1).

Offense Description

Did knowingly and unlawfully enter and was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who had been previously deported from the United States to Mexico on June 7, 2024, subsequent to a conviction for a felony.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.


Complainant's signature

Bradley Long, Deportation Officer

Printed name and title

Sworn to me via telephone or other reliable electronic means
 and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: September 10, 2024


Judge's signature

City and state: Charleston, South Carolina

Molly H. Cherry, U.S. Magistrate Judge

Printed name and title



STATE OF SOUTH CAROLINA }
COUNTY OF CHARLESTON } AFFIDAVIT

I, Bradley Long, being first duly sworn, hereby depose and state as follows:

1. I am employed as a Deportation Officer with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO). I have been employed with ICE ERO since May 2009. During that time, I have received training through the ICE Basic Immigration Law Enforcement Training Program at Glynco, GA and I have conducted investigations into both criminal and administrative matters involving violations of the United States Immigration and Nationality Act. My responsibilities include identifying and investigating illegal aliens with criminal histories that are subject to criminal prosecution, including violations of 8 U.S.C. § 1326;
2. That the information contained in this affidavit is based on my personal participation in this investigation and from information provided to me by other law enforcement officers. As this affidavit is being submitted for the limited purpose of establishing probable cause to support the arrest of Floro PEREZ Andablo, a.k.a Floro Andablo, Floro Perez, for violations of federal law, including, but not limited to: 8 U.S.C. § 1326(a) & (b)(1), I have not included each and every fact known to me concerning this investigation and have set forth only those facts that I believe are necessary for said purpose;
3. On or about February 15, 2005, at or near Calexico, California, PEREZ Andablo illegally entered the United States;
4. On September 22, 2006, ICE Officers encountered PEREZ Andablo incarcerated in the Douglas County Detention Center, Douglas, Colorado, after he was arrested for No Proof of Insurance and 3rd Degree Trespassing. PEREZ Andablo was interviewed and questioned regarding his immigration status in the United States and admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer. At this time an immigration detainer was placed on PEREZ Andablo;
5. On October 12, 2006, PEREZ Andablo was Voluntarily Returned to Mexico;
6. On an Unknown Date at or near an Unknown Location, PEREZ Andablo illegally entered the United States;
7. On July 26, 2015, Charleston County Sheriff's Deputies assigned to the ICE 287(g) Task Force, encountered PEREZ Andablo incarcerated in the Charleston County Detention Center, Charleston, South Carolina, after he was arrested for Driving Without a License. PEREZ Andablo was interviewed and questioned regarding his immigration status in the United States and admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer. PEREZ Andablo was granted Prosecutorial Discretion at this time;




8. On August 29, 2015, Charleston County Sheriff's Deputies assigned to the ICE 287(g) Task Force, encountered PEREZ Andablo incarcerated in the Charleston County Detention Center, Charleston, South Carolina, after he was arrested for Solicitation for Prostitution. PEREZ Andablo was interviewed and questioned regarding his immigration status in the United States and admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer. PEREZ Andablo was granted Prosecutorial Discretion at this time;
9. On July 26, 2019, Charleston County Sheriff's Deputies assigned to the ICE 287(g) Task Force, encountered PEREZ Andablo incarcerated in the Charleston County Detention Center, Charleston, South Carolina, after he was arrested for Kidnapping and Domestic Violence 2nd Degree. PEREZ Andablo was interviewed and questioned regarding his immigration status in the United States and admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer;
10. On July 28, 2019, an immigration detainer was placed on PEREZ Andablo in the Charleston County Detention Center, Charleston, South Carolina;
11. On July 29, 2019, PEREZ Andablo was served with a Notice to Appear form I-862;
12. On February 13, 2020, PEREZ Andablo pled guilty to Kidnapping (Felony) and Domestic Violence 2nd Degree (Felony) in the Court of General Sessions in Charleston, South Carolina. PEREZ Andablo was sentenced to time served on each count, with credit for 203 days of time served imprisonment on both counts;
13. On February 26, 2020, an Immigration Judge in Atlanta, Georgia ordered PEREZ Andablo to be removed to Mexico;
14. On March 9, 2020, the Order of Removal was executed, whereby PEREZ Andablo was removed from the United States to Mexico. On that day, PEREZ Andablo surrendered his fingerprint and photo for Immigration form I-205 (Warrant of Removal/Deportation) on which he signed. PEREZ Andablo's departure was witnessed and signed by an Immigration Officer;
15. On an Unknown Date at or near an Unknown Location, PEREZ Andablo illegally entered the United States;
16. On May 5, 2024, an anonymous tip was received by the ICE tip-line regarding PEREZ Andablo possibly residing at 5360 Savannah Highway, Lot 11, Ravenel, South Carolina, 29470;
17. On May 16, 2024, ICE Officers apprehended PEREZ Andablo after he left a residence located at 5360 Savannah Highway, Lot 16, Ravenel, South Carolina, 29470. On that same date, PEREZ Andablo was served with a Notice of Intent/Decision to Reinstate Prior Order form I-871;



18. On June 7, 2024, the Order of Removal was executed, whereby PEREZ Andablo was removed from the United States to Mexico. On that day, PEREZ Andablo surrendered his fingerprint and photo for Immigration form I-205 (Warrant of Removal/Deportation) on which he signed. PEREZ Andablo's departure was witnessed and signed by an Immigration Officer;
19. On an Unknown Date at or near an Unknown Location, PEREZ Andablo illegally entered the United States;
20. On July 15, 2024, an anonymous tip was received by the ICE tip-line regarding PEREZ Andablo possibly residing at 5360 Savannah Highway, Lot 11, Ravenel, South Carolina, 29470;
21. On July 24, 2024, PEREZ Andablo was observed during surveillance, outside of a residence located at 5360 Savannah Highway, Lot 16, Ravenel, South Carolina, 29470.
22. A Record check in the Computer Linked Application Informational Management System (CLAIMS) revealed no record that PEREZ Andablo filed an application for permission to reapply for admission into the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law. On August 4, 2024, this was confirmed by the issuance of the certificate of nonexistence of record from the United States Citizenship and Immigration Services;
23. Based on the foregoing, I submit there is probable cause to believe that PEREZ Andablo, is in violation of 8 U.S.C. § 1326(a) & (b)(1), in that, on or about July 24, 2024, in the County of Charleston in the District of South Carolina, he did knowingly and unlawfully enter and/or was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who previously had been deported from the United States to Mexico, on June 7, 2024.

This Affidavit has been reviewed by AUSA Dean H. Secor.

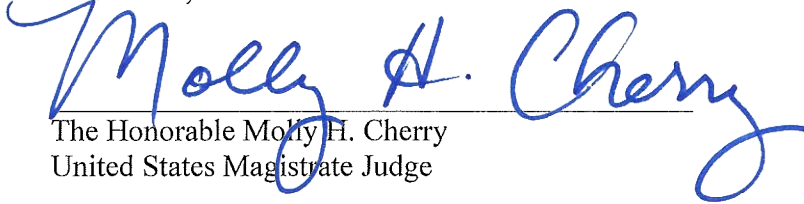


Bradley Long, Deportation Officer
United States Immigration and Customs Enforcement

SWORN TO ME VIA TELEPHONE OR
OTHER RELIABLE ELECTRONIC MEANS
AND SIGNED BY ME PURSUANT TO
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),
AS APPLICABLE.



This 10 day of September, 2024
Charleston, South Carolina


The Honorable Molly H. Cherry
United States Magistrate Judge

